

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Julie M. Dunnigan,

Plaintiff,

v.

Case No.: 15-cv-2626 (SRN/JSM)

Federal Home Loan Mortgage Corporation
d/b/a Freddie Mac,

Defendant.

DECLARATION OF MARK L. HEANEY

I, Mark L. Heaney, hereby declare as follows:

1. I am an attorney licensed to practice in Minnesota and Arizona.
2. I am admitted to practice before the United States Court of Appeals for the Eighth Circuit, as well as the District of Minnesota and the Western District of Wisconsin.
3. My office is in Minnesota, and the bulk of my cases are in Minnesota.
4. Since 2008, I have limited my practice to representing plaintiffs in cases involving claims under the Fair Credit Reporting Act (“FCRA”), the Fair Debt Collection Practices Act (“FDCPA”), and Telephone Consumer Protection Act (“TCPA”), among other state and federal consumer protection laws.
5. I am a member of National Association of Consumer Advocates (NACA). I also serve as the state co-chair for Minnesota for NACA. As part of my continuing legal education, I attend many of NACA’s and the National Consumer Law Center’s

conferences and trainings on litigation consumer rights cases, including cases under the FCRA.

6. I have known attorney John H. Goolsby since 2008, and I am familiar with his work product and legal skills. I have co-counseled on a FCRA case with Mr. Goolsby. I have attended national legal seminars in which Mr. Goolsby was a speaker on topics involving consumers' claims against businesses for violations of the FCRA.

7. I am familiar with the type of work involved in prosecuting FCRA claims. FCRA cases tend to be particularly labor-intensive because they typically require review of voluminous internal documents of defendants and/or third parties, in formats and codes that are unique to the industry.

8. My standard hourly rate for individual FCRA cases is \$425.00 per hour.

9. In my opinion, at least \$350.00 per hour for Mr. Goolsby is reasonable and appropriate for the present matter.

10. I have reviewed Mr. Goolsby's time records in this case, I am familiar with the stage of litigation at which this case was resolved, and in my opinion, the amount of time expended was reasonable and appropriate for the present matter.

I declare under the penalty of perjury that the foregoing is true and correct.

HEANEY LAW FIRM, LLC

Date: **October 12, 2016**

s/ *Mark L. Heaney*

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